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Attorney for Defendant Joseph Dibee

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,) NO. 6:06-cr-60011-AA-1
Plaintiff,)
v.)
JOSEPH DIBEE,) **DECLARATION OF COUNSEL IN
SUPPORT OF MOTION TO
CONTINUE TRIAL**
Defendant.)

Paul Hood, attorney for Joseph Dibee, provides this declaration in support of the Defendant's Motion to Continue Trial.

DECLARATION

I, Paul Hood, declare under penalty of perjury that the following is true to the best of my knowledge and belief:

1. Joseph Dibee was arraigned on August 10, 2018. He is presently in custody.
2. I am the attorney for Mr. Dibee, having been appointed on August 10, 2018, pursuant to 18 U.S.C. § 3006A(b).
3. This is the second continuance request by Mr. Dibee.
4. This request is made to permit time for discovery review and defense investigation.

5. The discovery materials in this case were originally produced more than twelve years ago. Some of those files are in an electronic format that employs old software. The defense is currently addressing this problem, but it has delayed the discovery review process significantly.
6. I have conferred with Assistant United States Attorney Geoffrey Barrow regarding delaying the trial. The Government does not oppose this motion.
7. I have conferred with my client regarding his right to a speedy trial and this motion to continue the trial date.
8. Mr. Dibee supports this continuance motion and request for a finding of excludable delay.

DATED this 7th day of January 2019. Respectfully submitted,

/s/ Paul Hood
PAUL HOOD, OSB No. 132271
Attorney for Joseph Dibee